

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,	No. 2:21-CR-04084-SRB
Plaintiff,	COUNTS 1 through 4 18 U.S.C. §§ 922(b)(5) and 924(a)(1)(D) NMT 5 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release Class C Felony
v.	
JAMES ANTONIO SKELTON, [DOB: 7/7/1947]	
Defendant.	COUNTS 5 and 6 18 U.S.C. §§ 924(a)(1)(A) and 2 NMT 5 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release Class C Felony
	COUNTS 7 through 11 18 U.S.C. §§ 922(m) and 924(a)(3)(B) NMT 1 Year Imprisonment NMT \$10,000 Fine NMT 1 Year Supervised Release Class A Misdemeanor
	COUNTS 12 through 15 18 U.S.C. §§ 922(t) and 924(a)(5) NMT 1 Year Imprisonment NMT \$10,000 Fine NMT 1 Year Supervised Release Class A Misdemeanor
	FORFEITURE ALLEGATION 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
	\$100 Special Assessment (Counts 1-6) \$25 Special Assessment (Counts 7-15)

I N D I C T M E N T

Introduction and Background

1. Beginning in or about September 24, 2021, and continuing through November 9, 2021, **JAMES ANTONIO SKELTON** used Skelton Tactical, a federal firearms licensee, to illegally sell firearms by allowing “straw purchases” of firearms.

2. Skelton Tactical held a Federal Firearms License as a Dealer in Firearms other than Destructive Devices. **SKELTON** was the owner and responsible party for Skelton Tactical.

3. As a Federal Firearms Licensee, Skelton Tactical was required to comply with the Gun Control Act of 1986, as amended, Title 18, United States Code, Chapter 44, and the regulations issued thereunder, Title 27, Code of Federal Regulations, Part 478. Compliance included, but was not limited to:

a. making certain the actual transferee of a firearm completed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, Form 4473 Firearms Transaction Record (hereafter “ATF Form 4473”);

b. certifying that the listed transferee was the actual transferee/buyer of the firearm sold;

c. completing a background check through the National Instant Criminal Background Check System (“NICS”), prior to the completion of the transfer/sale of a firearm to an unlicensed person; and,

d. recording certain information about the transferee in the firearms licensee’s Acquisitions and Dispositions records.

4. With respect to the identity of the actual transferee/buyer, the ATF Form 4473 specifically notified the licensee and the transferee/buyer that:

For purposes of this form, a person is the actual transferee/buyer if he/she is purchasing the firearm for him/herself or otherwise acquiring the firearm for him/herself. (e.g., redeeming the firearm from pawn, retrieving it from consignment, firearm raffle winner). A person is also the actual transferee/buyer if he/she is legitimately purchasing the firearm as a bona fide gift for a third party. A gift is not bona fide if another person offered or gave the person completing the form money, service(s), or item(s) of value to acquire the firearm for him/her, or if the other person is prohibited by law from receiving or possessing the firearm.

EXAMPLES: Mr. Smith asks Mr. Jones to purchase a firearm for Mr. Smith (who may or may not be prohibited). Mr. Smith gives Mr. Jones the money for the firearm. Mr. Jones is NOT THE ACTUAL TRANSFEE/BUYER of the firearm and must answer “no” to question 21.a. The licensee may not transfer the firearm to Mr. Jones.

5. The ATF Form 4473 specifically required the transferee/buyer to certify that he/she was the actual transferee/buyer of the firearm and warned the transferee/buyer as follows:

I certify that my answers in Section B are true, correct, and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering “yes” to question 21.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I understand that a person who answers “yes” to any of the questions 21.b. through 21.k. is prohibited from receiving or possessing a firearm. I understand that a person who answers “yes” to question 21.l.1. is prohibited from receiving or possessing a firearm, unless the person answers “yes” to question 21.l.2. and provides the documentation required in 26.d. I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law.

6. With respect to the identification of the actual transferee/buyer, the ATF Form 4473 further notified the licensee as follows:

Before a licensee may sell or deliver a firearm to a nonlicensee, the licensee must establish the identity, place of residence, and age of the transferee/buyer. The transferee/buyer must provide a valid government-issued photo identification document to the transferor/seller that contains the transferee’s/ buyer’s name, residence address, and date of birth. A driver’s license or an identification card

issued by a State is acceptable. Social Security cards are not acceptable because no address, date of birth, or photograph is shown on the cards.

7. With respect to the conduct of NICS check by the licensee, the ATF Form 4473 specifically stated:

18 U.S.C. 922(t) requires that prior to transferring any firearm to an unlicensed person, a licensed importer, manufacturer, or dealer must first contact the National Instant Criminal Background Check System (NICS). NICS will advise the licensee whether the system finds any information that the purchaser is prohibited by law from possessing or receiving a firearm. For purposes of this form, contacts to NICS include State agencies designated as points-of-contact (or POCs) to conduct NICS checks for the Federal Government.

8. The ATF Form 4473 charged the licensee with the following knowledge and responsibilities and required the licensee to make the following certification:

I certify that: (1) I have read and understand the Notices, Instructions, and Definitions on this ATF Form 4473; (2) the information recorded in Sections A, C and E is true, correct, and complete; and (3) this entire transaction record has been completed at the licensed business premises (“licensed premises” includes business temporarily conducted from a qualifying gun show or event in the same State in which the licensed premises is located) unless this transaction has met the requirements of 18 U.S.C. 922(c). Unless this transaction has been denied or cancelled by NICS or State agency, I further certify on the basis of — (1) the transferee’s/buyer’s responses in Section B (and Section D, if applicable); (2) the verification of the identification recorded in question 26 (and the re-verification at the time of transfer, if Section D was completed); and (3) State or local law applicable to the firearms business — it is my belief that it is not unlawful for me to sell, deliver, transport, or otherwise dispose of the firearm(s) listed on this form to the person identified in Section B.

COUNTS 1-4

(Failure by a Federally Licensed Dealer to Keep Proper Records)
18 U.S.C. §§ 922(b)(5) and 924(a)(1)(D)

9. On or about the dates set forth in each individual count, within Camden County, in the Western District of Missouri, the defendant, **JAMES ANTONIO SKELTON**, then being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly and willfully sold and delivered the firearm(s) set forth in each individual count, to the

individual noted in each individual count without noting in the defendant's records required to be kept by law pursuant to Title 18, United States Code, Section 923, the name, age, and place of residence of said purchaser of the firearm:

COUNT	DATE	FIREARM(S)	BUYER
1	9/24/2021	1) a Sig Sauer, .45 caliber pistol, model 220, serial number G208769	ATF UC #1
2	10/5/2021	1) an HS Produkt, 9mm caliber pistol, model Hellcat, serial number BA190033; 2) a Smith & Wesson, .44 caliber revolver, Performance Center, model 629-6, serial number DMY5623, and 3) a Kimber, .257Rob caliber rifle, model 84M Hunter, serial number KM63387	ATF UC #1
3	10/15/2021	1) an R.F.I., (Enfield), 7.62mm caliber rifle, model ISHAPORE 2A1, 1966, serial number J0240; 2) a Romarm/Cugir - Romania, 7.62 x 39mm caliber rifle, model GP / WASR-10 / 63, serial number 1972CC4541, imported by CAI Georgia, VT; 3) a Mossberg, 12-gauge pump action pistol grip shotgun, model 500, serial number T630512; 4) a Derya Arms – Turkey, 12-gauge shotgun, model VRPA40, serial number R342527, “Rock Island Armory” on the barrel, located on the shotgun: APINTL – PAHRUMP NV; and, 5) a Tisas – Turkey, .45 caliber pistol, model 1911A1 U.S. Army, serial number T0620-21Z15621, importer SDS Knoxville, TN	ATF UC #1

COUNT	DATE	FIREARM(S)	BUYER
4	10/29/2021	1) a BH Best Arms, 12-gauge shotgun, model BA912, serial number 21BP-00003; 2) a Pioneer Arms Corporation (Radom, Poland), 7.62 x 25mm caliber pistol, model PPS43-C, serial number AB10799P; 3) a Weihrauch, Hermann, .38 caliber revolver, model EA/R, serial number 1773131; 4) an ALFA-PROJ Czech Republic, .357Magnum caliber revolver, model AL 3.1, serial number ALFA132533; 5) a TISAS – TRABZON GUN INDUSTRY CORP., 9mm caliber pistol, model 1911A1 Service 9, serial number T0620-21K02118; 6) a TISAS – TRABZON GUN INDUSTRY CORP., 9mm caliber pistol, model 1911 A1 Service 9, serial number T0620-21K02121; 7) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19883; 8) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19879; 9) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19880; and, 10) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19881,	ATF UC #1

10. All in violation of Title 18, United States Code, Sections 922(b)(5) and 924(a)(1)(D).

COUNT 5
 (False Records in a Firearms Transaction)
18 U.S.C. §§ 924(a)(1)(A) and 924(a)(1)(D)

11. Between October 5, 2021, and October 15, 2021, said dates being approximate, within Camden County, in the Western District of Missouri, the defendant, **JAMES ANTONIO SKELTON**, aiding and abetting others, knowingly counselled the making of a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18,

United States Code, to be kept in the records of **JAMES ANTONIO SKELTON**, then being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, in that the defendant counseled ATF UC #1 to have another person, in fact ATF UC #2, execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives Form 4473, Firearms Transaction Record, to the effect that ATF UC #2 was the actual transferee/buyer of the following firearms: 1) a Romarm/Cugir - Romania, 7.62 x 39mm caliber rifle, model GP / WASR-10 / 63, serial number 1972CC4541, imported by CAI Georgia, VT, 2) a Mossberg, 12-gauge pump action pistol grip shotgun, model 500, serial number T630512, 3) a Derya Arms – Turkey, 12-gauge shotgun, model VRPA40, serial number R342527, “Rock Island Armory” on the barrel, located on the shotgun: APINTL – PAHRUMP NV, and 4) a Tisas – Turkey, .45 caliber pistol, model 1911A1 U.S. Army, serial number T0620-21Z15621, importer SDS Knoxville, TN, when in truth and fact, the actual transferee/buyer of those firearms was ATF UC #1, who had declined to execute a Form 4473, all in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT 6

(False Records in a Firearms Transaction)
18 U.S.C. §§ 924(a)(1)(A) and 924(a)(1)(D)

12. Between October 5, 2021, and October 29, 2021, said dates being approximate, within Camden County, in the Western District of Missouri, the defendant, **JAMES ANTONIO SKELTON**, aiding and abetting others, knowingly counselled the making of a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of **JAMES ANTONIO SKELTON**, then being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, in that the defendant counseled ATF UC #1 to have another person, in fact ATF UC #2, execute a

Department of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives Form 4473, Firearms Transaction Record, to the effect that ATF UC #2 was the actual transferee/buyer of the following firearms: 1) a BH Best Arms, 12-gauge shotgun, model BA912, serial number 21BP-00003, 2) a Pioneer Arms Corporation (Radom, Poland), 7.62 x 25mm caliber pistol, model PPS43-C, serial number AB10799P, 3) a Weihrauch, Hermann, .38 caliber revolver, model EA/R, serial number 1773131; 4) an ALFA-PROJ Czech Republic, .357Magnum caliber revolver, model AL 3.1, serial number ALFA132533, 5) a TISAS – TRABZON GUN INDUSTRY CORP., 9mm caliber pistol, model 1911A1 Service 9, serial number T0620-21K02118, 6) a TISAS – TRABZON GUN INDUSTRY CORP., 9mm caliber pistol, model 1911 A1 Service 9, serial number T0620-21K02121, 7) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19883, 8) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19879, 9) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19880, and 10) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19881, when in truth and fact, the actual transferee/buyer of those firearms was ATF UC #1, who had declined to execute a Form 4473, all in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNTS 7 through 11

(Failure to Make Entry in Records by a Federally Licensed Dealer - Acquisitions)
18 U.S.C. §§ 922(m) and 924(a)(3)(B)

13. On or about the dates set forth in each individual count, within Camden County, in the Western District of Missouri, the defendant, **JAMES ANTONIO SKELTON**, then being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly failed to make an appropriate entry in a record the defendant was required to keep

pursuant to Section 923 of Title 18, United States Code, that is, the defendant made transfers of the firearm set forth in each individual count without making entries in his bound Acquisition and Disposition Records Book regarding the acquisition of the firearm set forth in each individual count:

COUNT	DATE	ORIGIN	MODEL	TYPE	SERIAL #
7	9/24/2021	Sig Sauer	Model 220	.45 caliber pistol	G208769
8	10/5/2021	HS Produkt	Model Hellcat	9mm caliber pistol	BA190033
9	10/5/2021	Smith & Wesson	Performance Center, model 629-6	.44 caliber revolver	DMY5623
10	10/5/2021	Kimber	Model 84M Hunter	.257Rob caliber rifle	KM63387
11	10/15/2021	R.F.I., (Enfield)	Model ISHAPORE 2A1, 1966	7.62mm caliber rifle	J0240

14. All in violation of Title 18, United States Code, Sections 922(m) and 924(a)(3)(B).

COUNTS 12 through 15
(Failure by Federally Licensed Dealer to Conduct NICS Checks)
18 U.S.C. §§ 922(t) and 924(a)(5)

15. On or about the dates set forth in each individual count, within Camden County, in the Western District of Missouri, the defendant, **JAMES ANTONIO SKELTON**, then being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly transferred the firearms set forth in each individual count, to ATF UC #1, a person who was not licensed, without contacting NICS to conduct a background check of ATF UC #1,

COUNT	DATE	FIREARM(S)
12	9/24/2021	1) a Sig Sauer, .45 caliber pistol, model 220, serial number G208769

COUNT	DATE	FIREARM(S)
13	10/5/2021	1) a Kimber, .257Rob caliber rifle, model 84M Hunter, serial number KM63387; 2) an HS Produkt, 9mm caliber pistol, model Hellcat, serial number BA190033; 3) a Smith & Wesson, .44 caliber revolver, Performance Center, model 629-6, serial number DMY5623
14	10/15/2021	1) an R.F.I., (Enfield), 7.62mm caliber rifle, model ISHAPORE 2A1, 1966, serial number J0240; 2) a Romarm/Cugir - Romania, 7.62 x 39mm caliber rifle, model GP / WASR-10 / 63, serial number 1972CC4541, imported by CAI Georgia, VT; 3) a Mossberg, 12-gauge pump action pistol grip shotgun, model 500, serial number T630512; 4) a Derya Arms – Turkey, 12-gauge shotgun, model VRPA40, serial number R342527, “Rock Island Armory” on the barrel, located on the shotgun: APINTL – PAHRUMP NV; and, 5) a Tisas – Turkey, .45 caliber pistol, model 1911A1 U.S. Army, serial number T0620-21Z15621, importer SDS Knoxville, TN
15	10/29/2021	1) a BH Best Arms, 12-gauge shotgun, model BA912, serial number 21BP-00003; 2) a Pioneer Arms Corporation (Radom, Poland), 7.62 x 25mm caliber pistol, model PPS43-C, serial number AB10799P; 3) a Weihrauch, Hermann, .38 caliber revolver, model EA/R, serial number 1773131; 4) an ALFA-PROJ Czech Republic, .357Magnum caliber revolver, model AL 3.1, serial number ALFA132533; 5) a TISAS – TRABZON GUN INDUSTRY CORP., 9mm caliber pistol, model 1911A1 Service 9, serial number T0620-21K02118; 6) a TISAS – TRABZON GUN INDUSTRY CORP., 9mm caliber pistol, model 1911 A1 Service 9, serial number T0620-21K02121; 7) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19883; 8) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19879; 9) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19880; and, 10) a TISAS – TRABZON GUN INDUSTRY CORP., .45 caliber pistol, model 1911A1 U.S Army, serial number T0620-21Z19881,

16. All in violation of Title 18, United States Code, Sections 922(t) and 924(a)(5).

FORFEITURE ALLEGATION
18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

17. The allegations contained in Counts 1 through 15 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

18. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(b)(5) and 924(a)(1)(D), set forth in Counts 1 through 4 of this Indictment, Title 18, United States Code, Sections, 922(m) and 924(a)(3)(B) and 922(t) and 924(a)(5), set forth in Counts 7 through 15 of this Indictment, the defendant, **JAMES ANTONIO SKELTON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the willful commission of the offense, including, but not limited to the firearms identified in paragraph 20 of this Forfeiture Allegation.

19. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 924(a)(1)(A), set forth in Counts 5 and 6 of this Indictment, the defendant, **JAMES ANTONIO SKELTON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the knowing commission of the offense including, but not limited to the firearms identified in paragraph 20 of this Forfeiture Allegation.

20. Each basis for forfeiture of firearms applies to the firearms identified below:

Manufacturer	Type	Model	Caliber	Serial Number
Firearms International Corp (Washington, DC)	Combination Gun	Bronco	22/410	None

Manufacturer	Type	Model	Caliber	Serial Number
Firearms International Corp (Washington, DC)	Combination Gun	Bronco	22/410	A0494
Bond Arms, Inc.	Derringer	Texas Defender	45	126830
Doubletap Defense, LLC	Derringer	Double Tap	45	DA5128
Armscor of the Phillipines (Squires Bingham)	Pistol	M1911-A1	45	RIA2364044
Beretta USA Corp.	Pistol	92FS	9	BER386322Z
Beretta USA Corp.	Pistol	21A	22	DAA609057
Berretta, Pietro S.P.A.	Pistol	71	22	A62922U (Obliterated)
Colt	Pistol	1991A1	45	2776588
Colt	Pistol	National Match	45	GV019497
Colt	Pistol	1911	45	N2137105
Colt	Pistol	Defender Lightweight	45	DF009108
Colt	Pistol	1911	45	GV024764
Colt	Pistol	Government	38	38SCC3957
Colt	Pistol	1911	45	301571
FHN USA, LLC	Pistol	FNP9	9	61BMR04548
Girsan	Pistol	MC 1911	45	T6368-21CG00767
Glock GMBH	Pistol	27	40	GRA479
HS Produkt (IM Metal)	Pistol	Hellcat	9	BA237156
Hungary	Pistol	R-9	9	R28320
ISSC	Pistol	M22	22	BLA001760
Kahr Arms - Auto Ordnance	Pistol	CM9	9	G014897
Keltec, CNC Industries, Inc.	Pistol	PMR-30	22	WY3B75
Keltec, CNC Industries, Inc.	Pistol	PMR-30	22	WXZL86
Kimber	Pistol	Solo CDP	9	S1107225
Kimber	Pistol	Stainless LW	45	K714501

Manufacturer	Type	Model	Caliber	Serial Number
Kimber	Pistol	Solo Carry	9	S1130444
Kimber	Pistol	Custom LW	45	K738655
Kimber	Pistol	Micro 9	9	PB0308245
Kimber	Pistol	Custom II	45	K728770
Kimber	Pistol	Micro 9	9	TB0062437
Kimber	Pistol	Utra Aegis II	9	KUF20025
Llama (Gabilondo & CIA)	Pistol	Micro Max	380	71-04-10992-03
Menz, August	Pistol	Liliput	6.35	5095
Olympic Arms Inc. (SGW Enterprises & Safari Arms)	Pistol	Whitney Wolverine	22	WW2987
Remington Arms Company, Inc.	Pistol	1911	45	1138541
Remington Arms Company, Inc.	Pistol	1911	45	1299901
Remington Arms Company, Inc.	Pistol	1911	45	1914231
Ruger	Pistol	SR-22	22	360-60111
Ruger	Pistol	Mark II	22	211-46927
Ruger	Pistol	EC9S	9	459-76141
Ruger	Pistol	LC9	9	32489016
Ruger	Pistol	LCP	380	379010445
Ruger	Pistol	EC9S	9	45976216
Ruger	Pistol	LCP	380	379010446
Ruger	Pistol	LCP II	380	380631060
SCCY Industries, LLC (SKYY IND.)	Pistol	CPX-2	9	C153950
SCCY Industries, LLC (SKYY IND.)	Pistol	CPX-2	9	C146741
SCCY Industries, LLC (SKYY IND.)	Pistol	CPX-2	9	C078462
SCCY Industries, LLC (SKYY IND.)	Pistol	CPX-2	9	C146740

Manufacturer	Type	Model	Caliber	Serial Number
Shooters Arms Manufacturing, Inc. (Sam)	Pistol	M1911GI	45	GI118957
Sig Sauer	Pistol	P250	40	57C055044
Sig Sauer (Sig-Arms)	Pistol	GSR Revolution	45	GS09860
Smith & Wesson	Pistol	M&P 9	9	HNU5895
Smith & Wesson	Pistol	22A-1	22	UDB5305
Smith & Wesson	Pistol	M&P 9 Shield EZ M2.0	9	REX3147
Smith & Wesson	Pistol	Bodyguard	380	KJB5558
Smith & Wesson	Pistol	M&P 380 Shield EZ	380	RJD9071
Smith & Wesson	Pistol	M&P 380 Shield EZ	380	NJZ5077
Smith & Wesson	Pistol	M&P 380 Shield EZ	380	RJK8011
Smith & Wesson	Pistol	M&P 9 Shield EZ	9	RFF5406
Smith & Wesson	Pistol	M&P 9 Shield EZ 2.0	9	JNC3796
Smith & Wesson	Pistol	M&P 9 Shield EZ	9	RET7655
Smith & Wesson	Pistol	M&P 9 Shield EZ	9	RFD0381
Smith & Wesson	Pistol	M&P 380 Shield EZ	380	RJK6179
Smith & Wesson	Pistol	M&P 380 Shield EZ	380	NJV4914
Taurus International	Pistol	PT22	22	01016Y
Taurus International	Pistol	PT22	22	00794Y
Taurus International	Pistol	PT22	22	01104Y
Taurus International	Pistol	PT22	22	00372Y
Taurus International	Pistol	PT22	22	01108Y
Thompson/Center Arms Co.	Pistol	Contender	22	457324

Manufacturer	Type	Model	Caliber	Serial Number
Tisas - Trabzon Gun Industry Corp.	Pistol	Zigana PX-9	9	T0620-21BM17319
Walther	Pistol	PPK/S	380	AB121602
American Tactical Imports - ATI	Receiver/Frame	Omni Hybrid	Multi	NS107012
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21177804
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368567
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21178160
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183721
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368578
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21178153
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21178193
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21178200
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21178173
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183725
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183729
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183728
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368597
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183708
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183703
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183706
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368587
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183707

Manufacturer	Type	Model	Caliber	Serial Number
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183714
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21064821
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183726
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183702
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183724
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368577
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183719
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	2183722
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183720
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21064822
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183723
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183718
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183730
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183712
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368598
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21177829
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21178180
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183711
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21177813
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183704
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183716
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368557

Manufacturer	Type	Model	Caliber	Serial Number
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	21183727
Anderson Manufacturing	Receiver/Frame	AM-15	Multi	20368588
Palmetto State Armory	Receiver/Frame	M16A2	Multi	20011261
Palmetto State Armory	Receiver/Frame	M16A4	Multi	20011265
Palmetto State Armory	Receiver/Frame	M16A4	Multi	20011260
Palmetto State Armory	Receiver/Frame	M16A4	Multi	20011262
Palmetto State Armory	Receiver/Frame	M16A4	Multi	20011259
Alfa-Proj Spol S.R.O.	Revolver	AL3.1	357	ALFA132575
Alfa-Proj Spol S.R.O.	Revolver	AL3.1	357	ALFA132561
Alfa-Proj Spol S.R.O.	Revolver	AL3.1	357	ALFA132554
Alfa-Proj Spol S.R.O.	Revolver	AL3.1	357	ALFA132560
Armscor of the Phillipines (Squires Bingham)	Revolver	206	38	RIA2359177
Armscor of the Phillipines (Squires Bingham)	Revolver	206	38	RIA2359175
Charter Arms	Revolver	Undercover	38	21-71868
Charter Arms	Revolver	Undercover	38	20-73260
Charter Arms	Revolver	Undercover	38	2073275
Charter Arms Shelton, CT (Charter 2000)	Revolver	Undercover	38	21-71963
Charter Arms Shelton, CT (Charter 2000)	Revolver	Undercover	38	21-71961
Colt	Revolver	SAA	41	6789
Colt	Revolver	1895DA	38	220886
Guisasola Bros.	Revolver	Unknown	32	39617

Manufacturer	Type	Model	Caliber	Serial Number
Harrington and Richardson	Revolver	Trapper	22	124371
Harrington and Richardson	Revolver	732	32	AJ34064
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH049854
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH051008
Heritage Mfg., Inc.	Revolver	Rough Rider	22	1BH481505
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH082889
Heritage Mfg., Inc.	Revolver	Rough Rider	22	1PH053997
Heritage Mfg., Inc.	Revolver	Rough Rider	22	1BH483621
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH053004
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH051890
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH056312
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH056341
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH051967
Heritage Mfg., Inc.	Revolver	Rough Rider	22	1BH483613
Heritage Mfg., Inc.	Revolver	Rough Rider	22	3PH081811
Heritage Mfg., Inc.	Revolver	Rough Rider	22	1BH558696
Kimber	Revolver	K6S Combat	357	RV054399
Kimber	Revolver	K6S	357	RV069862
Kimber	Revolver	K6S Target	357	RV070072
North American Arms	Revolver	Unknown	22	L234351
North American Arms	Revolver	Unknown	ZZ	E447376
North American Arms	Revolver	Unknown	ZZ	E423314
Ruger	Revolver	SP101	327	576-98630
Smith & Wesson	Revolver	10	38	10D0729

Manufacturer	Type	Model	Caliber	Serial Number
Smith & Wesson	Revolver	.38 D/A 4th Model	38	B3650
Smith & Wesson	Revolver	Hand Ejector	32-20	120659
Smith & Wesson	Revolver	686	357	AZJ6719
Taurus	Revolver	689	357	IH192365
Taurus	Revolver	856	38	ABM201398
Taurus	Revolver	605 Protector Poly	357	ACG024735
Taurus	Revolver	605 Protector Poly	357	ACG024588
Taurus	Revolver	605 Protector Poly	357	ACG024681
Taurus	Revolver	Raging Bull	480	WD118801
Taurus International	Revolver	605	357	CG043651
Taurus International	Revolver	605	357	ACJ330463
Taurus International	Revolver	605	357	LP65170
Taurus International	Revolver	856	38	ACH128228
Weihrauch Hermann	Revolver	EA/R	357	1772476
Anderson Manufacturing	Rifle	AM-15	556	20284777
Armalite	Rifle	AR-7 Explorer	22	94890
Barrett Firearms Mfg. Co.	Rifle	REC-7	556	BR008201
Browning	Rifle	Unknown	ZZ	L7079
Browning	Rifle	Unknown	22	5T18051
CBC (Companhia Braziliera de Cartuchos)	Rifle	715T	22	EUF4487639
Enfield	Rifle	NO4MKI	303	E38516
Enfield	Rifle	NO2MKIV (Trainer)	22	5764
Harrington and Richardson	Rifle	M1	30	5749304
Harrington and Richardson	Rifle	Ultra	ZZ	HN303855
Heritage Mfg., Inc.	Rifle	Rough Rider Rancher	22	1BH489846

Manufacturer	Type	Model	Caliber	Serial Number
Hesse Ltd	Rifle	FAL-H/FALO	7.62	138216
Japan	Rifle	Type 99	ZZ	3673
Japan	Rifle	99	65	65902
Just Right Carbines, LLC	Rifle	J R Carbine	9	JR017795
Keltec, CNC Industries, Inc.	Rifle	SUB-2000	9	02607
Keystone Sporting Arms	Rifle	Crickett	22	944799
Marlin Firearms Co.	Rifle	336A	30-30	97041155
Marlin Firearms Co.	Rifle	3040	30-30	26017357
Mauser	Rifle	M98	8	8833
Mauser	Rifle	M98	8	4330
Mauser	Rifle	M98	8	6112
Mauser	Rifle	M98	8	3323
Mauser	Rifle	M98	8	7102
Mauser	Rifle	M98	8	46844
Mauser	Rifle	M98	8	5223
Mauser	Rifle	M98	8	5511
Mauser	Rifle	Unknown	8	13149
Mauser	Rifle	98	280	8945
Mauser	Rifle	98	ZZ	4774
Mauser	Rifle	Turkish Model 1893	8	1F38516
Mauser	Rifle	M98	8	7717
Mauser	Rifle	M98	8	4085
Mauser	Rifle	M98	8	9692
Mauser	Rifle	M98	8	1409
Miroku Firearm Co.	Rifle	Unknown	300 WM	33613MY351
Mosin-Nagant	Rifle	Unknown	762	R00405
Mosin-Nagant	Rifle	Unknown	762	M44072289
NORINCO (North China Industries)	Rifle	SKS	762	SKS28699
NORINCO (North China Industries)	Rifle	SKS	762	SKS28638

Manufacturer	Type	Model	Caliber	Serial Number
Remington Arms Company, Inc.	Rifle	03-A3	30-06	3425766
Remington Arms Company, Inc.	Rifle	700	25-06	C6881818
Remington Arms Company, Inc.	Rifle	Nylon 10	22	2454416
Remington Arms Company, Inc.	Rifle	1917	ZZ	282376
Ruger	Rifle	M77 Mark II	7	790-29641
Ruger	Rifle	M77 Mark II	7	790-47079
Ruger	Rifle	M77 Mark II	6	790-52542
Russian	Rifle	Mosin Nagant	762	4562
Savage	Rifle	99	303	276487
Savage	Rifle	99	250	208884
Savage	Rifle	99	303	302388
Savage	Rifle	99	300	355191
Savage	Rifle	99	300	397851
Savage	Rifle	12	204	H286992
Springfield Armory, Geneseo, IL	Rifle	M1A	762	2437784
Springfield Armory, Geneseo, IL	Rifle	M1	30	378136
Springfield Armory, Geneseo, IL	Rifle	M1	30	3395677
Springfield Armory, Geneseo, IL	Rifle	M1A	762	037812
Steyr	Rifle	Modelo 1912	308	C3817
Swiss Arms A.G. (San)	Rifle	Unknown	ZZ	551653
Rock Island Armory	Rifle	1903	30	95988
DC Industries	Rifle	NDS-2SF	ZZ	AKS740578
IBM	Rifle	M1	ZZ	3872212
Underwood	Rifle	M1	ZZ	2580432
Unknown Manufacturer	Rifle	Unknown	ZZ	AS02914
Winchester	Rifle	Wildcat	22	255MR11864

Manufacturer	Type	Model	Caliber	Serial Number
Unknown Manufacturer	Rifle	Unknown	303	7718
USA Military Surplus	Rifle	1917	30-06	486564
USA Military Surplus	Rifle	M1	30	964536
USA Military Surplus	Rifle	M1	30-06	3235852
USA Military Surplus	Rifle	M1	30	672278
USA Military Surplus	Rifle	Enfield NO4MKI	303	3903296
USA Military Surplus	Rifle	1917	30-06	276855
Winchester	Rifle	1890	22	573075
Winchester	Rifle	M1 Garand	30-06	2336695
Winchester	Rifle	M1 Garand	30-06	1280267
Winchester	Rifle	70	243	748911
Armelegant, Ltd.	Shotgun	SLB-X2	12	2110963NX2
Benelli, S.P.A.	Shotgun	M1 Super 90	12	M223200
Browning	Shotgun	Citori	28	27731NR773
Browning	Shotgun	Recoilless Trap	12	01010NV869
Browning	Shotgun	Browning 2000	12	44988C47
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342912
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342908
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343118
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342909
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343122
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343121

Manufacturer	Type	Model	Caliber	Serial Number
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342900
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343094
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342915
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342911
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343120
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342916
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343119
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342901
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342893
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342903
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342894
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342925
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342904
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343093

Manufacturer	Type	Model	Caliber	Serial Number
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342914
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342927
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342529
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343097
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342530
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342905
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342505
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342917
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342899
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342926
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343096
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342896
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R343095
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342897

Manufacturer	Type	Model	Caliber	Serial Number
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342924
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342898
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342463
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342910
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342907
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342528
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342913
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342902
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342504
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342895
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342906
Derya Arms (Derya Silah Sanayi)	Shotgun	VRPA40	12	R342526
F.N. (FN Herstal)	Shotgun	Unknown	12	51794
Hatsan Arms Co. (Silah Makina Kalip San. Tic. Ltd.)	Shotgun	Escort SD-X	410	912718
Hopkins and Allen	Shotgun	Forehand	12	3258
KOFS, Ltd.	Shotgun	Stevens 555	20	20A11612

Manufacturer	Type	Model	Caliber	Serial Number
Maverick Arms (Eagle Pass, Texas)	Shotgun	88	12	MV0625179
Mossberg	Shotgun	500C	20	J892801
Radikal Arms	Shotgun	P3	12	21-30401
Radikal Arms	Shotgun	P3	12	21-30403
Radikal Arms	Shotgun	P3	12	21-30402
Remington Arms Company, Inc.	Shotgun	870	12	RS29877C
Remington Arms Company, Inc.	Shotgun	870	16	775001W
Savage	Shotgun	Unknown	410	None
Torun Arms (Torun Silah San Ltd Sti)	Shotgun	Nomad	20	20SB20-003294
Winchester	Shotgun	12	12	988667
Winchester	Shotgun	1400MKII	12	N525595
Winchester	Shotgun	1200	12	L945923
Winchester	Shotgun	1400	12	112220
Winchester	Shotgun	37	12	None
Winchester	Shotgun	37	12	None
Winchester	Shotgun	1300 NWTF	12	L2262084
Tippman Arms Co.	Unknown Type	Gatling Gun	9	1323

Substitute Assets

21. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

22. All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

A TRUE BILL.

/s/ Kathleen Shaw
FOREPERSON OF THE GRAND JURY

/s/ Michael S. Oliver
MICHAEL S. OLIVER
Assistant United States Attorney
Missouri Bar No. 41832

Dated: 12/14/2021